

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

Cheetah Omni LLC,

Plaintiff,

vs.

Alcatel-Lucent USA Inc., et al.

Defendants.

HONORABLE LEONARD DAVIS

Case No. 6:11CV390

JURY TRIAL DEMANDED

**UNOPPOSED MOTION TO STAY THE
DEADLINES AS TO FUJITSU NETWORK
COMMUNICATIONS, INC.**

Cheetah Omni LLC (“Cheetah”) respectfully files this Unopposed Motion to Stay the Deadlines as to Fujitsu Network Communications, Inc., in light of Cheetah and Fujitsu Network Communications, Inc.’s agreement to settle the parties’ dispute. Cheetah requests that the Court order that any deadlines as to Fujitsu Network Communications, Inc. be stayed for sixty (60) days, up to and including February 17, 2014, pursuant to the parties’ agreement. Fujitsu Network Communications, Inc. agrees to the relief sought in this Unopposed Motion to Stay.

Respectfully submitted,

Dated: December 19, 2013

By: /s/ Thomas A. Lewry
Thomas A. Lewry (MI Bar No. P36399)
(Lead Attorney)
John S. Le Roy (MI Bar No. P61964)
Robert C.J. Tuttle (MI Bar No. P25222)
John M. Halan (MI Bar No. P37616)
Christopher C. Smith (MI Bar No. P73936)
Brooks Kushman P.C.
1000 Town Center, 22nd Floor

Southfield, Michigan 48075-1238
Tel: (248) 358-4400 – Fax: (248) 358-3351
Email: tlewry@brookskushman.com
jleroy@brookskushman.com
rtuttle@brookskushman.com
jhalan@brookskushman.com
csmith@brookskushman.com

T. John Ward, Jr. (TX State Bar No. 00794818)
Jack Wesley Hill
Ward & Smith Law Firm
1127 Judson Road, Suite 220
PO Box 1231
Longview, Texas 75606
Tel: (903) 757-6400 – Fax: (903) 757-2323
Email: jw@jwfirm.com
wh@jwfirm.com

Eric Miller Albritton
Albritton Law Firm
PO Box 2649
111 West Tyler, 75601
Longview, TX 75606
Tel: (903) 757-8449 – Fax: (903) 758-7397
ema@emafirm.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by email on December 19, 2013.

/s/ Thomas A. Lewry

CERTIFICATE OF CONFERENCE

Pursuant to LR CV-7(h) and (i), this is to certify that counsel for Cheetah Omni LLC has conferred with counsel for Fujitsu Network Communications, Inc. concerning this motion and they do not oppose the motion.

/s/ Thomas A. Lewry